

FILED

JUN 14 2023

TC

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Loretto Hospital, Inc.,

Plaintiff,

v.

Federal Insurance Company,

Defendant.

23-CV-3762

JUDGE ELLIS

MAGISTRATE JUDGE MCSHAIN

LORETTO HOSPITAL'S LOCAL RULE 5.7 STATEMENT

Pursuant to Local Rule 5.7, Loretto Hospital, Inc. ("Loretto"), through its undersigned attorneys, hereby makes a written request to file this case and its contents under seal. In support thereof and in addition to the reasons stated in Loretto Hospital's Motion for Leave to File Case Under Seal, it states the following:

1. Loretto, through its undersigned attorneys, makes the instant request to file this case under seal.
2. Loretto makes this request due to the special circumstances explained in its concurrently-filed Motion for Leave, including without limitation that this action involves insurance coverage related to a pending, on-going investigation. Accordingly, it is necessary to restrict public access to this case at filing.
3. Loretto is aware that absent an order extending or setting aside the sealing, the file and its contents will become public on the seventh day following the date of filing.
4. The undersigned attorneys are registered via the email addresses provided below as filing users of the electronic case filing (ECF) system. The caption of this case is *Loretto Hospital*,

Inc. v. Federal Insurance Company. The documents to be sealed are titled: (1) Complaint; (2) Loretto Hospital's Motion for Leave to File Case Under Seal; (3) Complaint Exhibit A; (4) Complaint Exhibit B; (5) Complaint Exhibit C; and (6) Complaint Exhibit E.

WHEREFORE, Plaintiff Loretto Hospital, Inc. respectfully requests that this Court grant this request and the accompanying Motion for Leave to File Case Under Seal and treat the concurrently-filed Complaint, Motion, and Exhibits A, B, C, and E as sealed.

Dated: June 14, 2023

/s/ James M. Davis

James M. Davis, Bar No. 6226698
JamesDavis@perkinscoie.com
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Telephone: 206.359.8000

Bradley H. Dlatt, Bar No. 6323821
BDlatt@perkinscoie.com
PERKINS COIE LLP
110 North Wacker Drive, Suite 3400
Chicago, Illinois 60606-1511
Telephone: 312.324.8400

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing, *Loretto Hospital's Local Rule 5.7 Statement*, has been filed on June 14, 2023 with the United States District Court of the Northern District of Illinois. The foregoing will be served via electronic mail and U.S. Mail, postage prepaid, upon the following:

CLYDE & CO US LLP
Edward J. Kirk
Scott Schwartz
The Chrysler Building
405 Lexington Avenue, 16th Floor
New York, New York 10174
Telephone: (212) 710-3900
Facsimile: (212) 710 3950
Edward.kirk@clydeco.us
scott.schwartz@clydeco.us

s/ James M. Davis